

IN RE: Annual Review of Base Rates for Fuel )  
Costs of Duke Energy Carolinas, LLC )  
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## INTRODUCTION

Coincident with this proceeding and pursuant to S.C. Code Ann. § 58-39-140, (Supp. 2015), this Commission will also determine whether an increase or decrease should be granted in the fuel cost component designed to recover the incremental or avoided costs incurred by DEC to implement the Distributed Energy Resource program previously approved by this Commission.

**PETITIONER**

1. SC Solar Development, LLC, (“SC Solar Development”) is a South Carolina Limited Liability Corporation, duly organized and authorized to conduct business in the State of South Carolina, with its registered agent located in Greenville, South Carolina. SC Solar Development, LLC is a wholly owned subsidiary of National Renewable Energy Corporation (“NARENCO”).

2. SC Solar Development, as a wholly owned subsidiary, operates under the business model of NARENCO. NARENCO is a vertically integrated Solar Company with in house development, design, engineering, procurement, construction, operations and maintenance and asset management. NARENCO, through its subsidiaries, including SC Solar Development, controls a pipeline of approximately 500 MW in South Carolina, has built nearly 100 MW of solar to this date, and has an approximately + 1GW pipeline across the southeast.

Request for Intervenor Status.

3. Petitioner, SC Solar Development has previously received approval for intervention from this Commission, in Commission Docket No. 2015-362-E, Docket No. 2015-8-E, Docket 2016-9-E, Docket 2016-2-E and Docket 2016-1-E.

4. SC Solar Development is financially impacted by this Commission's Review, as is outlined in more detail hereinbelow.

5. Specifically, Petitioner plans to conduct business with DEC, including sales to DEC's Consumers in DEC's assigned territory and Petitioner SC Solar Development has a material interest in this Commission's Review.

This Commission's Review.

6. This Commission is conducting a Review of DEC's fuel purchasing practices and policies pursuant to S.C. Code Ann. §58-27-865, (Supp. 2015).

7. Coincident with this proceeding and pursuant to S.C. Code Ann. §58-39-140, (Supp. 2015), this Commission will also determine whether an increase or decrease should be granted in the fuel cost component designed to recover the incremental or avoided costs incurred by the Company to implement the Distributed Energy Resource program previously approved by this Commission.

8. This Commission's annual Review of DEC's fuel purchasing practices and policies will determine if any adjustment in the fuel cost recovery mechanism is necessary and reasonable.

9. As outlined hereinabove, Petitioner, SC Solar Development has substantial business interests with DEC and DEC's Consumers in DEC's assigned territory in South Carolina.

10. Petitioner's position is that SC Solar Development has a direct and substantial interest in the Review to be made by this Commission in this Docket and Petitioner's interests cannot be adequately addressed by any other party. Petitioner's further position is that Petitioner SC Solar Development will be impacted by this Commission's decision upon its Review, outlined hereinabove. Therefore, the decision of this Commission is important to the Petitioner from a financial standpoint. Petitioner's further position is that Intervention is contemplated by S.C. Code Ann. §58-27-865, *et. seq.* (Supp. 2015), and Petitioner's Intervention will aid this Commission, by assisting in the development of a full and fair record to address the important Review to be conducted in this Docket. As shown above, Petitioner has a direct and material interest in this Commission's Review and Petitioner's interests are not adequately represented by the current parties in this Docket.

11. Petitioner's interests cannot be adequately addressed by any other party who has or may, intervene in this matter. Further, no other party has been given authority to legally bind or to act on Petitioner's behalf.

12. Furthermore, Petitioner's Intervention is consistent with this Commission's long standing policy, "...in encouraging maximum public participation in issues before the Commission, and [Intervention] [is] allowed so that a full and complete record addressing...views and concerns can be developed." (Order No.: 2005-725, in Docket No.: 2005-270-G, dated December 16, 2005).

13. This Petition to Intervene is timely filed with this Commission.

14. Petitioner should be allowed to intervene in this Docket, with full rights of cross examination, discovery and participation in any Hearing to be scheduled in this Docket.

### **PETITION TO INTERVENE**

15. The granting of SC Solar Development's Petition to Intervene is (i) contemplated by S.C. Code Ann. §58-27-865, *et. seq.* (Supp. 2015), (ii) in the public interest and (iii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and intervention should be allowed so that a full and complete record addressing its views and concerns can be developed.

16. SC Solar Development, LLC is represented by counsel in this proceeding:

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**WHEREFORE**, Petitioner prays for the following relief:

- (a) That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- (b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as is just and proper.

Respectfully Submitted,

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Columbia, South Carolina